

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHN RUFFINO and MARTHA RUFFINO, Husband and Wife,)	
)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No.: 3:17-cv-00725
)	
DR. CLARK ARCHER and HCA HEALTH SERVICES OF TENNESSEE, INC. d/b/a STONECREST MEDICAL CENTER,)	Jury Demand
)	Judge Crenshaw
)	Magistrate Judge Newbern
)	
Defendants.)	

HCA HEALTH SERVICES OF TENNESSEE, INC.'S
MOTION FOR SUMMARY JUDGMENT

HCA Health Services of Tennessee, Inc. d/b/a StoneCrest Medical Center ("StoneCrest"), in compliance with Federal Rule of Civil Procedure 56, Local Rule 56.01, and Local Rule 7.01(a), files this Motion for Summary Judgment. In support, StoneCrest relies on a Memorandum of Law and (1) its Statement of Undisputed Material Facts, (2) Plaintiffs' Complaint, (3) affidavits from Adrian A. Jarquin-Valdivia, M.D., and Jodi Dodds, M.D., (4) medical records from (a) Neurology Clinic Associates, (b) StoneCrest Medical Center, and (c) Centennial Medical Center, and (5) the deposition transcript of Martha Ruffino. Supporting materials are attached to a Notice of Filing. Because there is no genuine issue of material fact that StoneCrest complied with accepted standards of care and did not cause any injury to Plaintiffs that would not otherwise have occurred, StoneCrest respectfully submits it is entitled to summary judgment as a matter of law.

Respectfully submitted,

GIDEON, COOPER & ESSARY, PLC

/s/ J. Blake Carter

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished, by electronic means via the Court's electronic filing system, this 30th day of November, 2017, to the following:

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